

Document Name:	FL - 504 CoC Competition Policies and Procedures for New and Renewal Applications
Effective Date:	December 19, 2013
Latest revision Date:	August 30, 2021

## 1.0 Application for CoC Program Grant Funds

Upon HUD issuance of the CoC Program Grant Notice of Funding Opportunity (NOFO) , the Collaborative Applicant will prepare a master timeline of the CoC Program Grant process and will conduct the following steps to assure a well-communicated process for organizations to make application for CoC Program Funds to include, but not limited to:

- Establish all application, review and announcement deadlines sufficient to achieve reasonable public participation in the grant process and allow for timely submission to HUD
- Issue the local request for proposals for CoC Program Funds
- Publicize the request for proposal announcement through the Collaborative Applicant website, listserve, and email broadcasts
- Conduct a briefing on the CoC Program Grant Application process in advance of deadlines
- Prepare applications for prioritization and ranking
- Assist project applicants in the submission of application in eSNAPS

## 2.0 Reallocation: A CoC may reallocate funds in whole or part from existing eligible renewal projects to create one or more new projects.

The CoC will facilitate a providers and CoC membership meeting (open to the public) in order to brief the providers, CoC membership and community on the HUD NOFO guidelines and the reallocation process. All CoCs may use the reallocation process, regardless of their funding status, based on local CoC needs and priorities.

**Reallocation: Per Section II.B.1.b. of the HUD 2021 NOFO, HUD will prioritize funding for CoC's that have demonstrated the capacity to reallocate funding from lower to higher performing projects.**

**A new project may be created using reallocated funds from eligible renewal project(s) that have previously been renewed under the CoC Program. CoCs may choose to eliminate or reduce one or more eligible renewal projects to create one or more reallocated projects. The Applications**

Committee will determine what grants and amount of funding, if any, that will be reallocated based on performance and community need.

- The amount eliminated or reduced for the purposes of reallocation will be retained by the CoC, provided that the new proposed project(s) meets eligibility and quality thresholds established by HUD in the FY 2021 CoC Program Competition NOFO in order to be conditionally selected for funding.
- New Projects submitted for consideration under the reallocation process cannot exceed the amount designated by the Applications Committee for a new project with the total funding for new projects combined not to exceed the total amount designated for reallocation.
- CoCs are prohibited from reallocating administrative costs to create new projects.

In FY 2021 CoC Program Competition, CoCs may use the reallocation process to create:

- new permanent supportive housing projects that serve chronically homeless individuals, including unaccompanied youth, and families that must follow a Housing First Approach;
- new rapid re-housing projects for homeless individuals, including unaccompanied youth, and families coming directly from the streets or emergency shelter or fleeing domestic violence that must follow a Housing First Approach;
- New Joint Transitional / RRH projects to better serve homeless individuals and families, including individuals and families fleeing or attempting to flee domestic violence dating violence, sexual assault, or stalking.
- New Dedicated HMIS project for the costs at 24 CFR 578.37(a)(2) that can only be carried out by the HMIS Lead, which is the recipient or subrecipient of an HMIS grant, and that is listed on the HMIS Lead form in the CoC Applicant Profile in esnaps.
- Supportive Services Only Coordinated Entry (SSO-CE) project to develop or operate a Coordinated Entry System.

Bonus Projects:

**As stated in Section II.B.1 of this NOFA, the CoC must be able to demonstrate the ability to reallocate lower performing criteria to create new higher performing projects to be eligible to submit projects through the CoC Bonus process, also see Section II.B.1.a of this NOFO**

CoC's may submit Bonus grants up to allocated amount as determined by HUD for the CoC.

In FY 2021 CoC Program Competition, CoCs may use the **Bonus** process to create

- new permanent supportive housing projects that serve chronically homeless individuals, including unaccompanied youth, and families that must follow a Housing First Approach;
- new rapid re-housing projects for homeless individuals, including unaccompanied youth, and families coming directly from the streets or emergency shelter or fleeing domestic violence that must follow a Housing First Approach;
- New Joint Transitional / RRH projects to better serve homeless individuals and families, including individuals and families fleeing or attempting to flee domestic violence dating violence, sexual assault, or stalking.

- New Dedicated HMIS project for the costs at 24 CFR 578.37(a)(2) that can only be carried out by the HMIS Lead, which is the recipient or subrecipient of an HMIS grant, and that is listed on the HMIS Lead form in the CoC Applicant Profile in esnaps.
- Supportive Services Only Coordinated Entry (SSO-CE) project to develop or operate a Coordinated Entry System

In FY 2021 CoC Program Competition, CoCs may create New Projects for consideration for **DV Bonus**. New projects that want to be considered for the DV Bonus, may be:

- new rapid re-housing projects dedicated to serving survivors of domestic violence, dating violence, or stalking that are defined as homeless at 24 CFR 578.3; or
- New Joint TH and PH-RRH component projects as defined in Section III.C.2.n of this NOFO dedicated to serving survivors of domestic violence, dating violence, or stalking that are defined as homeless at 24 CFR 578.3;

*Coordination with Housing and Healthcare. Section II.B.*

The Consolidated Appropriations Act, 2021 directs HUD to provide incentives to create projects that coordinate with housing providers and healthcare organizations to provide permanent supportive housing and rapid rehousing services. In the FY 2021 CoC Program Competition, CoCs may receive up to 10 bonus points on the CoC Application if the CoC Priority Listing includes new project applications created through reallocation or the CoC Bonus that utilizes housing vouchers and healthcare provided through an array of healthcare services providers. See Section VII.B.6 of this NOFO for additional details

- A. Leveraging Housing Resources: New permanent supportive housing or rapid-rehousing project that utilizes housing subsidies or subsidized housing units NOT funded through CoC or ESG programs. (for example: private organizations, PHA’s set aside or limited preference)
- B. Leveraging Health Resources: New permanent supportive housing or rapid-rehousing project that utilizes healthcare resources to help individuals and families experiencing homelessness. (for example dedicated substance abuse treatment for those who choose to engage, 25% of the funding being requested for the project will be covered by the healthcare organization)  
(READ The NOFO)

### 3.0 CoC Project Ranking and Funding Decision Process

The CoC Board of Directors shall appoint an Applications Projects Review Committee (Applications Committee) whose primary purpose will be to carry out the project ranking and funding decisions for the Continuum of Care Program local competition. The Applications Committee may also serve in other prioritization and funding allocation capacities as determined by the CoC Board of Directors.

The CoC Board will appoint the Chair of the Applications Committee and make an annual call for nominations for Applications Committee Members. The CoC Board will elect from the slate of nominees up to 13 Applications Committee Members.

A. Conflicts of Interest

Applications Committee members may not be employees, contractors, or serve in any representative capacity of an applicant or a sub-recipient agency party to a funding application.

B. CoC Program Grant Ranking and Prioritization Procedures

The Collaborative Applicant will provide training to the Applications Committee on the CoC Grant Process that will be open to the public. The Applications Committee training will follow HUD guidance and the prioritization and ranking rules within the CoC Program Notice of Funding Availability.

The Applications Committee will conduct two open meetings inclusive of Collaborative Applicant staff as part of the project review and selection process. The first meeting will involve receipt of all CoC Program Application Materials. The Applications Committee Chair will provide final instruction to the committee on the review process. The second meeting will involve the final review, prioritization, and funding decisions.

The Collaborative Applicant will prepare the project priority list and funding decision as instructed by the Applications Committee. The list and Applications Committee Chair report will be presented at the next CoC Board of Directors meeting. The CoC Board of Directors will vote to accept the decisions of the Applications Committee. The Applications Committee is the final decision-making body for the determination of project priorities and funding levels. The CoC Board of Directors may direct the Collaborative Applicant to make minor budgetary corrections consistent with HUD application rules, as needed. The Collaborative Applicant will be charged with communicating budget adjustments to individual applicants before final submission of the application to HUD.

## 4.0 Implementation of Objective Criteria for Scoring New and Renewal Applications

These policies and procedures for Objective Criteria for Scoring New and Renewal Applications for HUD Continuum of Care funding were developed and implemented to improve the process of the FL504 Continuum of Care CoC Competition. The CoC Applications Committee, the body charged with the responsibility of allocating the CoC, approved these criteria in consultation with and provided notification to the CoC-funded provider organizations at an open forum meeting held on August 30, 2021. The minutes of the meeting, the scoring criteria (subject to revision upon release of the 2021 HUD CoC NOFO), and the scoring sheets for new and renewals were distributed via email and published on the website on August 31, 2021. The Applications will be ranked no later than October 8, 2021

pending any appeal; results will be posted no later than November 1, 2021, which is 15 days before the HUD CoC NOFO final submission due date.

The Applications Committee shall implement and apply the following criteria to score and allocate funds for new and renewal applications during the 2021 CoC Competition, as described below. Staff will provide Applications Committee members with scoring sheets and a master APR worksheet of all grants that have submitted an APR for the most recent grant year. The scores will be assessed and compiled by staff and members of the Applications Committee as appropriate. The Applications Committee, during its allocation meeting, ensure that the applications are eligible and meet all requires of the HUD CoC NOFA, the performance requirements as set forth in grants, and assist the CoC to meets its goals. The Applications Committee will review the scores and assign rank to each application. Staff will be directed to prepare the CoC grant in accordance with these policies and procedures.

The Applications Committee will rank HMIS and Coordinated Entry renewal grants as first priority grants due to their importance for the functioning of the entire Continuum of Care. Allocation of funding will be made according to rank order and review by the Application Committee. Priority ranking of identified grants outside of rank order may be made according to specific CoC and community needs to include:

- First-time renewable grants which have not been implemented or which **have not completed their second full year (no less than 24 months, and which may be scored and reviewed for threshold after completion of year 1)** would preclude them from being reallocated.
- Ranking of projects may be made based on the degree to which the project improves the CoC's entire system performance.

The CoC Application's Committee may adjust the selection and **order of priority** of competitive projects based on the following factors:

- A. Performance
- B. Community Need
- C. Geographical Diversity
- D. Project Diversity
- E. Funding Diversity

## 5.0 Provisions for Review of Victims Service Providers

- Whether or not victim service providers are participating in the CoHH and Coordinated Entry System, the CoHH must consult and incorporate guidance from all relevant victim service providers when developing Coordinated Entry policies and procedures in order to ensure accessibility, safety, and confidentiality for households who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or trafficking.

- At a minimum, all relevant victim service providers who are applying for funding through HUD CoC, ESG, State, and local resources must demonstrate a partnership with the CoHH in the development and implementation of:
  - A. A process to guide the operation of the CES to address the needs of households who are fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or trafficking, but who are seeking shelter or services from non-victim specific providers.
  - B. A process to ensure this population has safe and confidential access to the CES.
  - C. A process to ensure immediate access to emergency services such as victim service providers violence helplines and shelter.
- Victim service providers funded with, ESG, and CoC must either:
  - A. Serve as an access point or as a program accepting referrals in the CES, or
  - B. Establish and adhere to a comparable assessment and prioritization process for households who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or trafficking which meets the requirements of this document. The CoHH acknowledges for victim service providers, not all of the CES guidelines detailed will be relevant.
- Comparable database and associated reports must demonstrate the following for the purposes of applying for and scoring of HUD CoC, ESG and other State and local Applications:
  - A. Universal Data Elements (UDEs) / basic demographic information
  - B. Prioritization assessment or process to determine the most vulnerable of this population
  - C. Client served report
  - D. Progress reports of outputs and outcomes /Annual Progress Reports
    - 1. Successful placements
    - 2. Retention in permanent housing/exits to permanent housing of their own
    - 3. Returns to homelessness
    - 4. Increased income
      - From employment
      - Total income
    - 5. Length of time from identification to placement in permanent housing
- Utilization of the Coordinated Entry Process (in as much as possible within the scope of confidentiality)
- Adherence to Housing First Model

- Low Barriers to entry

## 6.0 CoC Application Appeal Policy and Process

Applicants shall have the right to file a written appeal within two working days following the decision of The Committee for each grant cycle. The written appeal should describe grounds on which the request is being submitted and include any pertinent documentation germane to the appeal.

- The two basic guidelines that shall be applied in granting the appeal will be:
  - A. Was the agency's request as presented misinterpreted by the Application Committee?
  - B. Has new information become available since the time of the scoring?
- Written appeals shall be filed by the CEO/Executive Director of the appealing agency via email with the CoC Applications Committee Chair, (D.J. Lebo – email: [djlebo@elcfv.org](mailto:djlebo@elcfv.org) ) who shall provide by fax or by email to each member of The Committee, a copy of the letter of appeal within forty-eight hours of receipt of the appeal.
- The Applications Committee Chair shall convene a meeting of The Applications Committee, which may be telephonic, within forty-eight hours of distribution by the Committee Chair of the appeal to the members of the Committee.
- The Applications Committee shall review the appeal which may, at the discretion of the majority of The Applications Committee, include testimony from the appellant.
- Within twenty-four hours of the review, The Chair of the Applications Committee shall provide the appellant, the Chair of the CoC Board of Directors and the Executive Director of the CoC Collaborative Applicant with written documentation of the process, the findings of The Applications Committee and a final decision of The Applications Committee, which shall not be subject to further appeal.

**HUD Appeal - Solo Applicants:** Eligible Project Applicants that attempted to participate in the CoC planning process in a geographic area in which they operate, that believe they were denied the right to participate in a reasonable manner –may submit a solo application to HUD and may be awarded a grant from HUD by following the procedure found in 24 CFR 578.35. Solo Applicants must submit their project applications by 7:59:59 p.m. eastern time on the date determined by the NOFO for the grant year being applied for. which must include the CoC's notification of rejection of the project in the local competition as an attachment to the Solo Applicant's project application. If the CoC fails to provide written notification outside of esnaps, the solo applicant must attach a statement that the CoC did not provide the solo Applicant written notification of the CoC rejecting the project in the local CoC competition.

The scoring criteria for New applications shall follow the designated 100-point scale as outlined in the New Rating Score sheet: (see attached scoring sheets)